

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JAN 4 2018
JAN 4, 2018

In the Matter of the Search of:

Case Number:

Magistrate Judge Sidney I. Schenkier
United States District Court

the US Express Mail package bearing tracking number EL764430015US, further described in Attachment A

18M9

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Kevin Hegi, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Offense Description

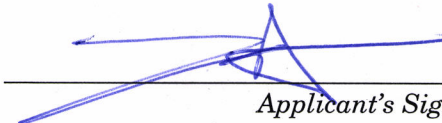
Title 21, United States Code, Section 843(b)

narcotics

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.



Applicant's Signature

KEVIN HEGI, Postal Inspector, U.S. Postal Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: January 4, 2018



Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge

Printed name and title

instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL

5. On January 3, 2018, I inspected the **Subject Parcel** at USPS JT Weeker International Service Center, in Chicago, Illinois. The **Subject Parcel** was mailed on January 3, 2018, from Chicago, 60612 and is addressed to "Jose Abelar 111 Bank St. Box # 371 Grass valley, CA 95945," with a return address of "Jesse Andrus 2628 W. Augusta Blvd. Chicago, IL 60622." The **Subject Parcel** bears \$23.75 in postage, measures approximately 12.5 inches x 9.5 inches, and weighs approximately 14 ounces.

6. I observed characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, cash was utilized to pay postage on the **Subject Parcel**. In my training and experience, drug traffickers often utilize cash to pay for postage in order to avoid association with the parcel.

8. Second, a review of postal databases indicated that the listed recipient and recipient address were associated with a previous seizure of a parcel that was found to contain marijuana.

9. The characteristics I describe above can be consistent with parcels that do not contain contraband.

10. On January 4, 2018, I arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Perro," to meet with me and examine the **Subject Parcel**. According to the Canine Officer, Perro is certified annually by United States Customs and Border Protection as a narcotics dog. Perro was most recently re-certified on February 6, 2017. Perro is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Perro is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Perro has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 166 occasions since July 2013, with a success rate of approximately 91%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

11. On January 4, 2018, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 20 other parcels in the workroom area. I then witnessed Perro examine the parcels and observed Perro alert by sitting next to the **Subject Parcel**. Perro did not alert to any of the other parcels. The Canine Officer informed me that Perro's actions indicated the presence of

narcotics and/or controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.

II. CONCLUSION

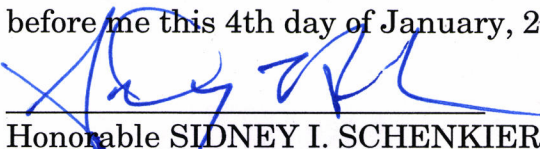
12. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Kevin Hegi
Postal Inspector
U.S. Postal Inspection Service

Subscribed and sworn
before me this 4th day of January, 2018



Honorable SIDNEY I. SCHENKIER
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The US Express Mail Package with Tracking Number EL764430015US, bearing a return address of "Jesse Andrus 2628 W. Augusta Blvd. Chicago, IL 60622" a recipient address of "Jose Abelar 111 Bank St. Box # 371 Grass valley, CA 95945."

The **Subject Parcel** weighs approximately 14 ounces, is approximately 12.5 inches x 9.5 inches in size, and bears \$23.75 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States Currency, which constitutes evidence or instrumentalities of the Subject Offense;
4. Items that identify the sender or receiver of the **Subject Parcel**.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

the US Express Mail package bearing tracking
number EL764430015US, further described in
Attachment A

Case Number:

18M9

SEARCH AND SEIZURE WARRANT

To: Kevin Hegi and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of
the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person
or property described above, and that such search will reveal:


See Attachment B

YOU ARE HEREBY COMMANDED to execute this warrant on or before January 18, 2018 in the daytime
(6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an
inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate
Judge.

Date and time issued: January 4, 2018 AT 3:30 PM


Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature*_____
Printed name and title

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The US Express Mail Package with Tracking Number EL764430015US, bearing a return address of "Jesse Andrus 2628 W. Augusta Blvd. Chicago, IL 60622" a recipient address of "Jose Abelar 111 Bank St. Box # 371 Grass valley, CA 95945."

The **Subject Parcel** weighs approximately 14 ounces, is approximately 12.5 inches x 9.5 inches in size, and bears \$23.75 in postage.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities and contraband concerning violation of Title 21,
United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States Currency, which constitutes evidence or
instrumentalities of the Subject Offense;
4. Items that identify the sender or receiver of the **Subject Parcel**.